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February 22, 2023

**VIA ECF**

The Honorable Katherine Polk Failla  
United States District Judge  
United States District Court  
Southern District of New York  
Thurgood Marshall  
United States Courthouse  
40 Foley Square  
New York, NY 10007

**Re:** *Fagnani v. Promotion Pros LLC*,  
Case No.: 1:22-cv-10796

Dear Judge Failla,

The undersigned represents Mykayla Fagnani (“Plaintiff”) in the above referenced matter against Defendant, Promotion Pros LLC, (“Defendant”) (collectively the “Parties”). We write, with Defendant’s consent, to inform the Court that the Parties have reached a settlement in principle and respectfully request that Your Honor dismiss this action with prejudice with the right to reopen in forty-five (45) days if the Settlement Agreement is not consummated. In light of the anticipated settlement, the undersigned respectfully requests all currently pending deadlines in this action be adjourned *sine die*.

We thank the Court for its time and attention in this matter.

Respectfully submitted,  
/s/Michael A. LaBollita, Esq.  
Michael A. LaBollita, Esq.

cc: All counsel of record via ECF